

UNITED STATES COURT OF APPEALS FOR THE FEDERAL CIRCUIT
717 MADISON PLACE, N.W., WASHINGTON D.C. 20439

CASE NO.: 16-1703

Trademark Trial and Appeals Board (Opposition 91197060)

EMERALD CITIES COLLABORATIVE, INC. (ECC)
Opposer/Counterclaim Defendant – Appellant

v.

SHERI JEAN ROESE (ROESE)
Applicant/Counterclaim Plaintiff – Appellee

RECEIVED

JUN 01 2016

**United States Court of Appeals
For The Federal Circuit**

MOTION FOR EXTENSION

At the recommendation of the Court Clerk's Office, this Motion is to request the Court to grant me extension of time to in order to respond to Counterclaim Defendant/Appellant's Brief. Being that the Court previously rejected my informal response as being premature, I realize that I need the help of an attorney in order to prepare a proper response for the Court.

Considering that from 2011-2015, I did successfully represent myself Pro Se in the Trademark Trial and Appeals Board (Opposition 91197060), it's that I was forced to for reasons of financial hardship through that protracted litigation. Without oral argument, in December of 2015 I am fortunate that judgment was rendered in favor of my Counterclaim against Appellant. Having prevailed against Appellant on a clear violation of Law, I now have the opportunity to be represented Pro Bono by a Washington DC attorney in the Federal Circuit. I would like to do this if possible, as I cannot possibly respond as Pro se to Appellant's Brief with the time allowed.

Representation would also preserve my right to oral argument, which I was not afforded the opportunity to do in the case previously won which is now being appealed.

With less than 30 days left, this to respectfully request the court's extension of time in order that I may seek counsel before I submit my final Brief. Thank you.

A handwritten signature in black ink, appearing to read 'Sheri Roese', with a long horizontal flourish extending to the right.

**Sheri Jean Roese, Appellee
34522 N. Scottsdale Road, Ste 637
Scottsdale, Arizona 85266**

CERTIFICATE OF SERVICE

I hereby certify that I served a copy of the foregoing **MOTION FOR EXTENSION** upon Counterclaim Defendant/Appellant, by depositing a copy thereof in the United States Mail on May 31, 2016 addressed as follows:

Lawrence E. James
Joshua W. Newman
Reed Smith LLP
10 South Wacker Drive, 40th Floor
Chicago, IL 60606-7507



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CASE # 16-1703

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